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*Proposed Counsel for The Diocese of Camden, New Jersey,
Chapter 11 Debtor and Debtor-in-Possession*

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

THE DIOCESE OF CAMDEN, NEW JERSEY,

Debtor.

Chapter 11

Case No. 20-21257 (JNP)

APPLICATION FOR DESIGNATION AS COMPLEX CHAPTER 11 CASE

TO: THE HONORABLE JERROLD N. POSLUSNY, JR.
UNITED STATES BANKRUPTCY JUDGE

On October 1, 2020 (the "Petition Date"), The Diocese of Camden, New Jersey (the "Diocese") filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") with the United States Bankruptcy Court for the District of New Jersey. The undersigned proposed counsel to the Diocese believes that this case qualifies under the Court's General Order Governing Procedures for Complex Chapter 11 Cases, dated November 25, 2009, as a complex Chapter 11 case because:

- ☒ The Debtor has total liabilities of more than \$25 million.
- ☒ The Debtor has total assets of more than \$53 million.
- ☒ There are more than 300 creditors in this case.
- ☐ Claims against the Debtor are publicly traded.

☐ Other: _____

Respectfully submitted,

**McMANIMON, SCOTLAND
& BAUMANN, LLC**

*Proposed Counsel for Debtor and Debtor-in-
Possession, The Diocese of Camden, New Jersey*

By: /s/ Richard D. Trenk
RICHARD D. TRENK

Dated: October 1, 2020